

JAGAT TRADING ENTERPRISES LIMITED

Regd. Office: 208, Magnum House II, Karampura Commercial Complex,
New Delhi – 110015 (NCT Delhi)
Corporate Identity Number (CIN) – L74999DL1982PLC014411

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

(Pursuant to Regulation 8(1), Chapter –IV of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

I. Preamble

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the “Regulations”) further amended with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 requires a listed company to formulate and publish on its official website a Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information (hereinafter referred as “Code”) in adherence to the principles set out in Schedule A to the said Regulations.

II. Objective of the Code

The Code is required for Jagat Trading Enterprises Limited (“the Company”) to prevent the misuse and ensure timely and adequate disclosure of Unpublished Price Sensitive Information (‘UPSI’) and to maintain the uniformity, transparency and fairness in dealing with the stakeholders.

III. Guidelines for Fair Disclosure

The Company, Board, officers, employees and connected persons as defined shall adhere to the following guidelines as framed as under, involving the compliance of Regulations with respect to principles of fair disclosure of unpublished price sensitive information in letter and spirit

- 1) The Chief Investor Relations Officer (“CIRO”) shall ensure prompt public disclosure of **Unpublished Price Sensitive Information (UPSI)** to stock exchanges and on the website of the Company, that would impact price discovery, as soon as it has credible and concrete information, in order to make such information ‘generally available’, i.e. to make the information accessible to the public on a non-discriminatory basis.
- 2) The Company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure except for legitimate purpose(s) as defined in the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the Company.
- 3) The CIRO shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.
- 4) The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- 5) The CIRO shall ensure that information shared with analysts and research personnel is not UPSI.
- 6) The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
- 7) The CIRO shall ensure the handling of all UPSI on a need-to-know basis.
- 8) The Compliance Officer of the Company shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.
- 9) Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as “legitimate purposes” for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the PIT regulations.

- 10) A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.
- 11) Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI PIT regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI (PIT) Regulations.

(Note: Clauses 9 to 11 incorporated pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 shall come into effect from:1st April, 2019.)